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Attorneys for Defendant,
 N.S., a minor, by and through his parents
 ANGELA GENNINO and WAYNE SAMDAHL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

OAKLAND UNIFIED SCHOOL DISTRICT,
 Plaintiff,

vs.

N.S., a minor, by and through his parents
 ANGELA GENNINO and WAYNE
 SAMDAHL,

Defendant.

Case No.: 14-cv-05569-JSW (KAWx)

**JOINT STIPULATION FOR
 VOLUNTARY DISMISSAL OF N.S.'S
 MOTION FOR ATTORNEY'S FEES
WITH PREJUDICE AND REQUEST FOR
 RETENTION OF JURISDICTION FOR
 ENFORCEMENT OF SETTLEMENT;**

AND

[~~PROPOSED~~] ORDER AS MODIFIED

AND RELATED ACTIONS

TO THE COURT:

Plaintiff and Cross-Defendant Oakland Unified School District ("OUSD"), and
 Defendant and Counter-Plaintiff N.S., a minor, by and through his parents, Angela Gennino and
 Wayne Samdahl, hereby stipulate as follows:

1. WHEREAS, on November 24, 2015, N.S. filed a motion for attorney's fees
 (Docket No. 44);

OUSD v. N.S.

1

14-cv-05569-JSW (KAWx)

**JOINT STIPULATION FOR VOLUNTARY DISMISSAL WITH PREJUDICE AND
 REQUEST FOR RETENTION OF JURISDICTION FOR ENFORCEMENT OF
 SETTLEMENT; AND [~~PROPOSED~~] ORDER**

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2. WHEREAS, on December 11, 2015, the parties filed a joint notice of conditional settlement and request to stay proceedings (Docket No. 62), which was granted;

3. WHEREAS, the parties now have a complete settlement agreement; and

4. WHEREAS, under the terms of the agreement, OUSD shall make a settlement payment within 30 calendar days;

THEREFORE, IT IS REQUESTED THAT:

1. Counter-Plaintiff N.S.'s motion for attorney fees (Docket No. 44) be DISMISSED WITH PREJUDICE; and

2. This Court shall retain jurisdiction over the parties to enforce the settlement until performance in full of the terms of the settlement. Should the parties wish to have Magistrate Judge Westmore retain jurisdiction to enforce settlement, they will have to file a notice of consent to this effect.

Dated: January 14, 2016

MILLER WASHINGTON & KIM, LLP

By: _____/s/_____
Natashe Washington
Attorneys for Defendant & Counter-Plaintiff,
N.S., a minor, by and through his Guardian Ad
Litem, Angela Gennino


Dated: January 14, 2016

FAGEN FRIEDMAN & FULFROST, LLP

By: _____/s/_____
David R. Mishook
Attorneys for Plaintiff & Counter-Defendant,
OAKLAND UNIFIED SCHOOL DISTRICT

IT IS SO ORDERED.

Dated: January 21, 2016



Hon. Hon. Judge A. Westmore